

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

Malikie Innovations Ltd. and
Key Patent Innovations, Ltd.,

Plaintiffs,

v.

Core Scientific, Inc.

Defendant.

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Case No. 2:25-CV-519-JRG-RSP

JURY TRIAL DEMANDED

**JOINT MOTION FOR VENUE DISCOVERY AND EXTENSION OF TIME TO
RESPOND TO CORE SCIENTIFIC'S MOTION TO TRANSFER**

Plaintiffs Malikie Innovations Ltd. and Key Patent Innovations Ltd. (collectively “Plaintiffs” or “Malikie”) and Defendant Core Scientific, Inc. (“Defendants” or “Core Scientific”) (together the “Parties”), jointly move the Court for leave to conduct discovery on venue matters related to Defendant Core Scientific, Inc.’s Motion to Transfer Venue Under 28 U.S.C. § 1404(a) (Dkt. 23). The parties jointly request the following schedule for jurisdictional and venue-related discovery:

Venue-Related Discovery

1. Plaintiffs may serve up to seven (7) requests for production; Defendant will respond, including producing responsive documents, as soon as practicable but no more than twenty-one (21) days from service.
2. Plaintiffs may serve up to seven (7) interrogatories; Defendant will respond no more than fourteen (14) days from service.
3. Plaintiffs may conduct up to a total of ten (10) hours of depositions limited to the issue of venue.

4. Until the Court enters a Protective Order, any discovery produced in response to the venue discovery requests may be designated as “Confidential – Outside Attorneys’ Eyes Only,” such that disclosure of such discovery shall be limited to Plaintiffs’ outside attorneys of record and employees of Plaintiffs’ outside attorneys of record.

Timing of Discovery

5. Initial discovery requests will be served within seven (7) business days from the filing of this motion. Plaintiffs may serve any remaining discovery requests at any time thereafter, so long as such discovery is within the agreed to limits in paragraphs 1 and 2 above.
6. Discovery will close sixty (60) days from the filing of this motion. The parties will cooperate in good faith should extensions of this deadline become necessary.
7. Plaintiffs’ Response to Defendant Core Scientific, Inc.’s Motion to Transfer Venue Under 28 U.S.C. § 1404(a) will be due two (2) weeks after the close of venue-related discovery.
8. Any reply or sur-reply shall proceed in accordance with the Court’s local rules.

The foregoing discovery shall not count toward the discovery limits set forth in the Discovery Order to be entered by the Court.

Dated: July 30, 2025

Respectfully submitted,

/s/ Brian E. Ferguson

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CERTIFICATE OF SERVICE

I certify that the foregoing document was filed electronically on July 30, 2025 pursuant to Local Rule CV-5(a) and has been served on all counsel who have consented to electronic service

/s/ Claire Abernathy Henry
Claire Abernathy Henry

CERTIFICATE OF CONFERENCE

Counsel for Plaintiff and counsel for Defendant have met and conferred pursuant to Local Rule CV-7(h). The Parties are in agreement and are filing this motion jointly.

/s/ Claire Abernathy Henry
Claire Abernathy Henry